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# THE NYE

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March 10, 2020

Hon. Jenny A. Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
MAR 11 2020  
SC Court of Appeals

Re: Thomas Ford, III v. Town of Hardeeville  
SECOND MOTION FOR EXTENSION OF TIME  
Appellate Case No. 2019-001107

Dear Ms. Kitchings,


The Respondent's Brief in the above referenced appeal is due on Wednesday, March 11, 2020. I respectfully request a thirty (30) day extension of this deadline. This is my second request for an extension of time, and it is not intended for purposes of delay (as it is reasonable and necessary due to my work and court schedule).

Please note that I notified opposing counsel, Dayne C. Phillips, Esq., of this request and he has consented to this extension of time. Thank you for your assistance in this matter. Your consideration is greatly appreciated. If you have any questions or concerns, please do not hesitate to contact me.

THE NYE LAW GROUP, P.C.

JDM

cc: Dayne C. Phillips, Esq.

  
Justin D. Maines  
Attorney for Town of Hardeeville

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the within and foregoing Motion for Extension of Time by delivering through first class mail with sufficient postage affixed to ensure delivery a true and correct copy of the same upon:

Hon. Jenny A. Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Dayne C. Phillips, Esq.  
Attorney for Appellant  
1614 Taylor St., Suite D  
Columbia, SC 29201

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**MAR 11 2020**

**SC Court of Appeals**

Respectfully submitted March 10, 2020,

By: \_\_\_\_\_

*JDM*  
Justin D. Maines  
Attorney for Town of Hardeeville  
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Savannah, GA 31401  
[jd@thenyelawgroup.com](mailto:jd@thenyelawgroup.com)

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JOANNE ENGUM  
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UNITED STATES US

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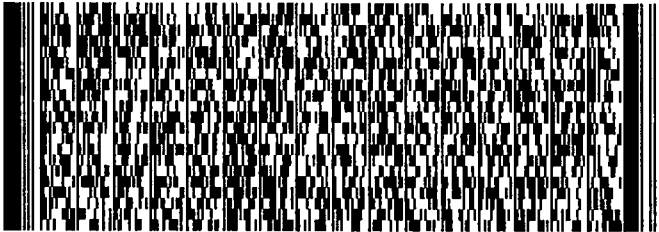
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